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Attorneys for Defendants  
Leigafoalii Tafue Williams  
and Papu Christopher Williams

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

DEUTSCHE BANK NATIONAL	)	CIVIL NO. 11-00632 JMS RLP
TRUST COMPANY, AS TRUSTEE	)	
MORGAN STANLEY ABS	)	DECLARATION OF
CAPITAL I INC. TRUST 2007-NC1	)	GRETCHEN H. KLUNGNESS;
MORTGAGE PASS-THROUGH	)	EXHIBITS A – G and
CERTIFICATES, SERIES 2007-NC1,	)	EXHIBIT U
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
LEIGAFOALI'I TAFUE WILLIAMS,	)	
fka LEIGAFOALI'I TAFUE	)	
KOEHNEN; PAPU CHRISTOPHER	)	

WILLIAMS; REAL TIME )  
RESOLUTIONS, INC.; CAROLYN )  
RUTH KOEHNEN, AS TRUSTEE OF )  
THE CAROLYN R. KOEHNEN )  
REVOCABLE LIVING TRUST U/A, )  
DATED APRIL 14, 1986; and JOHN )  
DOES 1-5, )

Defendants. )  
\_\_\_\_\_ )

**DECLARATION OF GRETCHEN H. KLUNGNESS**

1. Except as otherwise explicitly provided, the following statements are true to the best of my personal knowledge and belief.

2. My name is Gretchen H. Klungness, and I am a legal assistant to Stanley H. Roehrig, an attorney licensed to practice law within the State of Hawaii, who is one of the attorneys representing the Defendants Leigafoali`i Tafue Williams, fka Leigafoali`i Tafue Koehnen, and Papu Christopher Williams in the above-entitled action.

3. Attached hereto as Exhibit A is a true and correct copy of the case of *Deutsche Bank National Trust Company as Trustee under the Pooling and Service Agreement Series Index 2006-AR6 v. Maraj*, 856 N.Y.S.2d 497, WL 253926 (2008).

4. Attached hereto as Exhibit B is a true and correct copy of the case of

*Scarola v. Deutsche Bank National Trust Company as Trustee for the Holders of Gsaa Home Equity Trust 2004-10 Asset-Backed Certificates Series 2004-10*, 2011 WL 5335618 (M.D.Fla.) (8/15/2011).

5. Attached hereto as Exhibit C is a true and correct copy of the case of *Kunzman v. Deutsche Bank National Trust Company, as trustee for Argent Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2005-W4*, 2011 WL 4055286 (D. Colo.) (9/12/11).

6. Attached hereto as Exhibit D is a true and correct copy of the case of *In re New Century TRS Holdings, Inc. v. New Century Liquidating Trust*, 407 B.R. 576 (2009) at 585.

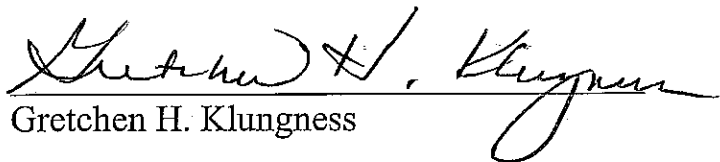
7. Attached hereto as Exhibit E is a true and correct copy of the case of *New Century Mortgage Corporation v. Braxton*, 2010 WL 59277 (Mass.Land.Ct.) (2010).

8. Attached hereto as Exhibit F is a true and correct copy of the Declaration of Monika L. McCarthy in Support of Chapter 11 Petitions and First Day Relief in the New Century TRS Holdings, Inc., jointly-administered bankruptcy case filed in the United States Bankruptcy Court for the District of Delaware, dated April 2, 2007, and obtained from Public Access to Court Electronic Records (PACER).

9. Attached hereto as Exhibit G is a true and correct copy of the Plaintiff's Motion to Clarify Prior Order or, in the alternative, to Certify Final Judgment and to Stay Proceedings Pending Appeal; Memorandum in Support of Motions; Declaration of Gretchen H. Klungness; Notice of Hearing; Certificate of Service), filed in the Circuit Court of the First Circuit, State of Hawaii, in Civil No. 09-1-1906 BIA. Exhibit G is attached without its exhibits, except for Exhibit U, which is also attached hereto as Exhibit U. This document was obtained from the Securities and Exchange (SEC) website on May 3, 2011.

Further Declarant saith naught.

DATED: Hilo, Hawai'i, December 15, 2011.

  
Gretchen H. Klungness